

11/16/09

IN THE UNITED STATES DISTRICT  
COURT FOR THE MIDDLE DISTRICT  
OF PENNSYLVANIA

DAVID E. HILL  
PLAINTIFF

v.

CIV. NO. ~~3:11-cv-01609~~

FILED  
SCRANTON

AUG 29 2011

Per. JW  
DEPUTY CLERK

HARLEY LAPPIN, DIRECTOR;  
et. al.,

DEFENDANT

DECLARATION OF DAVID E. HILL

I, DAVID E. HILL, DECLARE THAT THE FOLLOWING TO BE A TRUE AND CORRECT STATEMENT OF FACTS:

1. ON MARCH 12, 2011, I SUFFERED ANOTHER ASTHMA ATTACK, DIFFICULTY BREATHING, CHEST PAINS, BURNING SKIN, HEADACHES, NAUSEA, COUGHING, GAGGING, STINGING SENSATION IN MY EYES, DIZZINESS, AND PRODUCTION OF SPUTUM, RESULTING FROM STAFF SPRAYING PEPPER SPRAY/ CHEMICAL AGENTS IN THE UNIT. THE PEPPER SPRAY, CHEMICAL AGENTS ARE EXA-

CERBATING my ASTHMA CONDITION. I HAVE BEEN COMPLAINING TO MEDICAL PERSONAL ABOUT THE CIRCUMSTANCES AND ASKING TO BE MOVED. TO DATE, NOTHING HAS CHANGED.

2. ON MARCH 25, 2011, I SUFFERED ANOTHER ASTHMA ATTACK, DIFFICULTY BREATHING, CHEST PAINS, BURNING SKIN, HEADACHES, NAUSEA, COUGHING, GAGGING, STINGING SENSATION IN MY EYES, DIZZINESS, AND PRODUCTION OF SPUTUM, RESULTING FROM STAFF SPRAYING PEPPER SPRAY, CHEMICAL AGENTS IN THE UNIT. THE PEPPER SPRAY, CHEMICAL AGENTS ARE EXA-CERBATING my ASTHMA CONDITION. I HAVE BEEN COMPLAINING TO MEDICAL PERSONAL ABOUT THE CIRCUMSTANCES AND ASKING TO BE MOVED. TO DATE, NOTHING HAS CHANGED.

3. ON MARCH 29, 2011; MARCH 30, 2011; ~~MAY 12, 2011; MAY 22, 2011~~, I SUFFERED SEVERE ASTHMA ATTACKS, DIFFICULTY BREATHING, CHEST PAINS, BURNING SKIN, HEADACHES, NAUSEA, COUGHING, GAGGING, STINGING SENSATION IN MY EYES, DIZZINESS, AND PRODUCTION OF SPUTUM, RESULTING FROM STAFF

SPRAYING PEPPER SPRAY, CHEMICAL AGENTS IN THE UNIT. THE PEPPER SPRAY, CHEMICAL AGENTS ARE EXAGGERATING MY CHRONIC ASTHMA CONDITION. I HAVE BEEN COMPLAINING TO MEDICAL PERSONAL ABOUT THE CIRCUMSTANCES, AND ASKING TO BE MOVED. TO DATE, NOTHING HAS CHANGED.

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE STATEMENTS ARE TRUE AND CORRECT.

EXECUTED THIS June 1, 2011

David E. Hill  
DAVID E. HILL #1258507  
P.O. Box. 1000  
Lewisburg, PA 17837